

Exhibit A
[PROPOSED] Order

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

WEIL, GOTSHAL & MANGES LLP
Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)|
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER & BENVENUTTI LLP
Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case
No. 19 -30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**[PROPOSED] ORDER PURSUANT TO
11 U.S.C. § 1121(d) EXTENDING
EXCLUSIVE PERIODS**

1 Upon the Motion, dated _____, 2019 [Docket No. #] (the “**Motion**”)¹ of PG&E Corporation
2 (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in
3 possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned chapter 11 cases (the
4 “**Chapter 11 Cases**”), pursuant to section 1121(d) of title 11 of the United States Code (the
5 “**Bankruptcy Code**”), for entry of an order extending the Debtors’ exclusive periods in which to file
6 a chapter 11 plan (the “**Exclusive Filing Period**”) and solicit acceptances thereof (the “**Exclusive**
7 **Solicitation Period**,” and together with the Exclusive Filing Period, the “**Exclusive Periods**”), all as
8 more fully set forth in the Motion; and this Court having jurisdiction to consider the Motion and the
9 relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, *Order Referring Bankruptcy Cases*
10 *and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.), and Rule 5011-1(a) of the
11 Bankruptcy Local Rules for the United States District Court for the Northern District of California
12 (the “**Bankruptcy Local Rules**”); and consideration of the Motion and the requested relief being a
13 core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to
14 28 U.S.C. §§ 1408 and 1409; and the Court having found and determined that notice of the Motion as
15 provided to the parties listed therein is reasonable and sufficient under the circumstances, and it
16 appearing that no other or further notice need be provided; and this Court having reviewed the Motion,
17 the Wells Declaration (as amended on February 2, 2019 [Docket No. 263]), and the Boken Declaration;
18 and this Court having held a hearing on the Motion; and this Court having determined that the legal
19 and factual bases set forth in the Motion establish just cause for the relief granted herein; and it
20 appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates,
21 creditors, shareholders, and all parties in interest; and upon all of the proceedings had before this Court
22 and after due deliberation and sufficient cause appearing therefor,

23 **IT IS HEREBY ORDERED THAT:**

- 24 1. The Motion is granted as provided herein.
- 25 2. Pursuant to section 1121(d) of the Bankruptcy Code, the Debtors’ Exclusive
- 26

27 _____
28 ¹ Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such
terms in the Motion.

1 Filing Period in which to file a chapter 11 plan is extended to and including November 29, 2019.

2 3. Pursuant to section 1121(d) of the Bankruptcy Code, the Debtors' Exclusive
3 Solicitation Period in which to solicit acceptances of their chapter 11 plan is extended to and including
4 January 28, 2020.

5 4. The extensions of the Exclusive Periods granted herein are without prejudice to
6 such further requests that may be made pursuant to section 1121(d) of the Bankruptcy Code by the
7 Debtors or any party in interest, for cause shown, upon notice and a hearing.

8 5. This Court shall retain jurisdiction to hear and determine all matters arising
9 from or related to the implementation, interpretation, or enforcement of this Order.
10

11 ** END OF ORDER **
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28